

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ARISE FOR SOCIAL JUSTICE; JOISTE?
NEW ENGLAND STATE-AREA
CONFERENCE OF THE NAACP; REV.
TALBERT W. SWAN, II; GUMERSINDO
GOMEZ; FRANK BUNTIN; RAFAEL
RODRIQUEZ; and DIANA NURSE,

Plaintiffs,

Civil Action No. 05-30080 MAP

v.

CITY OF SPRINGFIELD and SPRINGFIELD
ELECTION COMMISSION,

Defendants.

TRIAL AFFIDAVIT OF ERROL CAMPBELL

I, Errol Campbell, hereby certify as follows:

1. I reside at 274 Gilbert Ave. in Springfield, Massachusetts. I have lived in Springfield for approximately 17 years. I am a 53 year old African-American male.
2. I served as Ms. Carol Lewis-Caulton's campaign manager when Ms. Lewis-Caulton ran for the Springfield, Massachusetts City Council ("City Council") in 1997, 1999, 2001 and 2003. In addition, I have been politically active in my community as secretary to the Springfield chapter of the National Association for the Advancement of Colored People in approximately 1996-1997, and as a member of the Springfield Million Man March Committee.
3. In about 1997, while I was NAACP secretary, I published a letter in the Springfield newspaper criticizing the decision to suspend, rather than fire, a police officer whose dogs had bitten a young girl, and who had abandoned his post to secure his dogs before seeking medical assistance for the girl. Soon after the letter was published, I received a letter mailed to

me in a Springfield Police Department envelope stating that a dog should bite me, and that “What goes around comes around. It will be coming around to you,” or words to that effect. The person who wrote the threatening letter to me never was identified.

4. In 1997, Ms. Lewis-Caulton lost her race for City Council. In 1999, Ms. Lewis-Caulton won a seat on the City Council by a small margin, and then served a single two-year term. Ms. Lewis-Caulton ran for re-election in 2001, but lost. Ms. Lewis-Caulton ran again for City Council in 2003, and again lost. Ms. Lewis-Caulton is the only African-American woman ever elected to the City Council.

5. During the 1997 campaign, Ms. Lewis-Caulton and I decided that I, and other African-American men, would stop attending certain campaign events in predominantly white neighborhoods. Our decision was based on a number of factors. First, a member of the Massachusetts state legislature told Ms. Lewis-Caulton, during the 1997 campaign, that Ms. Lewis-Caulton should not campaign with me, or other African-American males, because voters would feel threatened or intimidated by African-American men. Additionally, Ms. Lewis-Caulton and I believed, based on our experiences living and campaigning in Springfield, that African-American men were not received well in predominantly white neighborhoods in Springfield, and that Ms. Lewis-Caulton’s campaign was adversely affected by my presence in those neighborhoods.

6. Before making the decision to stop attending certain events, I had regularly attended debates and other campaign events with Ms. Lewis-Caulton in predominantly white neighborhoods, as well as in predominantly African-American and Latino/Hispanic neighborhoods. When I attended events in predominantly white neighborhoods, I frequently felt unwelcome due to behavior that I perceived as race-based. For example, during the 1997 City

Council campaign, I attended a debate with Ms. Lewis-Caulton at the Goodwill Center in Ward 5, which is in a predominantly white neighborhood. I felt generally unwelcome at that debate, and noticed my presence affected Ms. Lewis-Caulton's reception; in particular, I noticed that people attending the debate tended not to approach Ms. Lewis-Caulton if I was standing with her, but that people freely approached her if I was not nearby. I never felt unwelcome because of my race when attending campaign events in predominantly African-American and Latino/Hispanic neighborhoods.

7. For the remainder of the 1997 campaign, I frequently did not appear with Ms. Lewis-Caulton when she campaigned in predominantly white neighborhoods. Ms. Lewis-Caulton and I employed this strategy with greater frequency during the 1999, 2001, and 2003 campaigns than we had during the 1997 campaign. For example, during the 1999 campaign, I did not attend a debate held at Our Lady of Mercy in Ward 2, and I also did not attend a campaign event at the Frederick Harris School in Ward 7, both of which are in predominantly white neighborhoods. I continued, during the 1999, 2001 and 2003 City Council campaigns, to attend campaign events and to appear with Ms. Lewis-Caulton in predominantly African-American and Latino/Hispanic neighborhoods.

8. In addition to not appearing with Ms. Lewis-Caulton while she was campaigning in predominantly white neighborhoods, I and other African-American men generally did not appear at "stand-outs" for Ms. Lewis-Caulton in predominantly white neighborhoods. At a stand-out, volunteers would typically hold campaign signs for Ms. Lewis-Caulton and wave at passers-by in busy intersections. I started organizing stand-outs for Ms. Lewis-Caulton during the 1999 campaign, and continued to do so during the 2001 and 2003 campaigns. For about one month before election day, I would organize about three stand-outs per week, each at a different

location in Springfield. For stand-outs in predominantly African-American or Latino/Hispanic neighborhoods, I would participate, and I would generally recruit African-American and Latino/Hispanic supporters of Ms. Lewis-Caulton to participate. I did not have difficulty recruiting African-American or Latino/Hispanic volunteers to appear at stand-outs. For stand-outs in predominantly white neighborhoods, I would generally not participate; instead, I would go to the location of the stand-out to distribute campaign signs to the volunteers, but would wait in my car. I had difficulty recruiting enough white supporters from Springfield to appear at stand-outs for Ms. Lewis-Caulton. After continued difficulty recruiting white volunteers from Springfield, I began to recruit white individuals from outside of Springfield to participate in stand-outs in predominantly white neighborhoods. I, and other African-American men, only participated in stand-outs in predominantly white neighborhoods when there were not enough white volunteers.

9. As a City Councilor and candidate, Ms. Lewis-Caulton was in favor of demanding payments in lieu of taxes from large nonprofits in the City. The large nonprofits – Western New England College, Springfield College, Baystate Medical Center, and American International College – have been expanding and taking more land out of Springfield's tax base. This makes it harder for the City to provide services to its residents.

10. Payments in lieu of taxes is an issue that is particularly important to the minority community. The minority community as a whole is less well-off than the white community and relies on the City to provide social services. Also, because many minorities are poor, they cannot afford to move out of the City as services are cut, and as residential property taxes increase to compensate for taxes lost because of property taken by large nonprofits. Several political insiders in the City - Mayor Albano, Sheriff Michael Ashe, District Attorney William Bennett - do not

presently live in the City. They do not have to worry about the expansion of large nonprofits in Springfield causing services where they live to be cut back, or causing their residential tax bills to increase. It a problem for the people who continue to live in the City.

11. The Springfield Finance Control Board has recognized the importance of payments in lieu of taxes and recently reached an agreement with Baystate Medical Center pursuant to which Baystate will make payments to the City.

12. You cannot reach any conclusions about the opportunities for African Americans to succeed in city politics by looking at Deval Patrick's success in 2006. The governor's race is very different from City races because the governor's race is partisan. This difference was especially important in 2006, because there was a national movement favoring Democrats over Republicans.

13. I believe that Carmen Rosa was elected to the School Committee because people did not know that she was Hispanic. She was a newcomer to politics, and people did not know much about her. Because of her name, many voters thought that she was Italian.

14. Carmen Rosa gave a speech about racism while she was a School Committee member. In the speech, she said something to the effect of, "racism is a disease of white people." The Springfield Union-News turned against her after this incident. Other elements of the white-dominated political establishment that had supported Rosa's candidacy in 1993 followed the lead of the Union-News and also turned against her. It was as if the City were saying, there are some things that you just shouldn't talk about.

Signed under penalties of perjury, this 31st day of January, 2007.



Errol Campbell

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 2, 2007.

/s/ Paul E. Nemser